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3800 Howard Hughes Parkway, Suite 950
Las Vegas, Nevada 89169

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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANGELA MARTINEZ, an Individual,)	Case No.
)	
Plaintiff,)	
)	NOTICE OF REMOVAL OF
vs.)	ACTION
)	
VADATECH, INC.; EMPLOYEE(S)/)	
AGENT(S) DOES 1-10; and ROE)	
CORPORATIONS 11-20, inclusive,)	
)	
Defendants.)	

TO: UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

PLEASE TAKE NOTICE that Defendant, VadaTech, Inc., by and through its counsel, FISHER & PHILLIPS LLP, hereby files this Notice of Removal of Action of this cause from the Eighth Judicial District Court of the State of Nevada, Case No. A-14-707948-C (the "State Action"), in which it is now pending, to the United States District Court for the District of Nevada, and respectively states as follows:

1. The jurisdiction of this court is invoked under 29 U.S.C. § 201, *et seq.*
2. On October 1, 2014, Plaintiff filed her Complaint in the State Action, which Complaint was served on Defendant on December 18, 2014. All process,

1 pleadings and orders served on Defendant in connection with the State Action are
2 attached.

3 3. The grounds for removal are as follows: the Complaint alleges claims
4 under the Fair Labor Standards Act, presenting federal questions under 29 U.S.C.
5 § 201, *et seq.*
6

7 4. This Notice of Removal of Action is executed pursuant to Rule 11 of the
8 Federal Rules of Civil Procedure.

9 DATED this 18th day of December, 2014.

10 FISHER & PHILLIPS LLP

11
12 /s/ Whitney J. Selert, Esq.
13 SCOTT M. MAHONEY, ESQ.
14 WHITNEY J. SELERT, ESQ.
15 3800 Howard Hughes Parkway
Suite 950
Las Vegas, Nevada 89169

16 Attorneys for Defendants

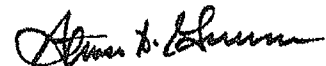
17 **CERTIFICATE OF ELECTRONIC SERVICE**

18 This is to certify that on the 18th day of December 2014, the undersigned, an
19 employee of Fisher & Phillips LLP, electronically filed the foregoing Notice of
20 Removal of Action with the U.S. District Court, and a copy was electronically
21 transmitted from the court to the e-mail address on file for:
22

23 Christian Gabroy, Esq.

24
25 By: /s/ Denise M. Karpa
An employee of Fisher & Phillips LLP
26
27
28

Electronically Filed
10/01/2014 04:59:12 PM



CLERK OF THE COURT

1 **COMP**
2 GABROY LAW OFFICES
3 Christian Gabroy (#8805)
4 The District at Green Valley Ranch
5 170 South Green Valley Parkway, Suite 280
6 Henderson, Nevada 89012
7 Tel (702) 259-7777
8 Fax (702) 259-7704
9 CHRISTIAN@GABROY.COM
10 ATTORNEYS FOR PLAINTIFF

11 **DISTRICT COURT**

12 **EIGHTH JUDICIAL DISTRICT COURT, CLARK COUNTY NEVADA**

13 ANGELA MARTINEZ, an Individual,

Case No.: A-14-707948-C

Dept.: XXIII

14 Plaintiff,

15 vs.

16 **COMPLAINT**

17 VADATECH, INC.;
18 EMPLOYEE(S)/AGENT(S) DOES 1-10;
19 and ROE CORPORATIONS 11-20,
20 inclusive,

21 **(JURY DEMAND)**

22 Defendants.

23 **COMPLAINT AT LAW**

24 COMES NOW Plaintiff, Angela Martinez ("Plaintiff" or "Martinez"), by and through
25 her attorney Christian Gabroy, Esq. of Gabroy Law Offices, and hereby alleges and
26 complains against Defendant Vadatech, Inc. ("Defendant" or "Vadatech") and states as
27 follows:

28 **NATURE OF PLAINTIFF'S CLAIMS**

29 1. This lawsuit arises under the Fair Labor Standards Act, 29 U.S.C. §201, *et*
30 *seq.* ("FLSA"), and Nevada Revised Statute ("NRS") 608.140, *et. seq.* for Defendants'
failure to pay lawful wages to Plaintiff. Plaintiff customarily worked in excess of 40 hours
per week for Defendant but was not paid all of her earned wages including her earned

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1 wages for her time worked in excess of forty (40) hours per individual work week.
 2 Defendants' unlawful compensation practices have had the effect of denying Plaintiff her
 3 earned and living wages including but not limited to her overtime wages and regular
 4 wages. An estimated and approximated amount of wages and penalties owed and due to
 5 Plaintiff has been previously provided by Plaintiff in a five day demand to Defendants
 6 pursuant to NRS 608.140. Defendants did not honor such demand. Defendants did not
 7 negotiate in good faith regarding such demand. See attached consent to joinder hereto as
 8 Exhibit I.
 9

10 2. Plaintiff herein demands a jury trial on all issues triable by jury.

11 THE PARTIES

12 3. At all times relevant, Plaintiff was a resident of and domiciled within Clark
 13 County, in the State of Nevada.

14 4. At all times relevant, Defendant was incorporated under the laws of the
 15 State of Nevada, was listed with the Nevada Secretary of State, and was doing business
 16 within Clark County, NV, where the subject unlawful employment practices occurred.

17 5. At all times, Defendant was an "enterprise" as defined by in Section 3(r)(1)
 18 of the FLSA, 29 U.S.C. §203(r)(1). More specifically, Defendant was an enterprise
 19 engaged in commerce or in the production of goods for commerce within the meaning of
 20 Section 3(s)(1)(A) of the FLSA in that Defendant has engaged in an annual gross volume
 21 of sale made or business done that exceeds the \$500,000.00 minimum threshold
 22 requirement of the FLSA, exclusive of excise taxes.
 23

24 6. At all times hereto, Defendant was Plaintiff's "employer" and thus subject to
 25 the FLSA, 29 U.S.C. §201 *et seq.* At all times hereto, Defendant had custody or control
 26 over the Plaintiff and her employment, and was responsible for Plaintiff's labor and
 27

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1 employment matters while Plaintiff was employed by Defendant at the time Plaintiff's
 2 wages were lawfully due.

3 7. The true names of DOES 1 through 10 and Roe Corporations 11 through
 4 20, their citizenship and capacities, whether individual, corporate, associate, partnership
 5 or otherwise, are unknown to Plaintiff who therefore sues these Defendants by such
 6 fictitious names. Plaintiff is informed and believes, and therefore alleges, that Defendants,
 7 including DOES 1 through 10 and Roe Corporations 11 through 20, were individuals who
 8 are in some manner negligent and wrongful towards Plaintiff, were Plaintiff's employer,
 9 caused injury to Plaintiff, and/or otherwise damaged Plaintiff. Plaintiff is further informed
 10 and believes, and therefore alleges, that each of the Defendants, designated as DOES 1
 11 through 10 and Roe Corporations 11 through 20, are or may be, legally responsible for
 12 the events referred to in this action and other events not mentioned in this action, and
 13 caused damages to the Plaintiff including but not limited to causing Plaintiff to not be paid
 14 her lawful wages. Plaintiff will ask leave of this Court to amend the Complaint to insert
 15 the true names and capacities of such Defendants, when the same have been
 16 ascertained, and to join them in this action, together with the proper charges and
 17 allegations.
 18
 19

20 JURISDICTION AND VENUE

21 8. This Court has jurisdiction over Plaintiff's FLSA claims pursuant to 29
 22 U.S.C. §216(b) and otherwise which states in relevant part that this action may be
 23 maintained in any Federal or State court of competent jurisdiction.
 24

25 FACTUAL ALLEGATIONS

26 9. Defendant offered to employ Plaintiff on or about June 24, 2011.

27 10. On or about July 18, 2011, Plaintiff began work for Defendant in an inside
 28

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1 sales support position.

2 11. Defendant holds itself out to the public as "the leading manufacturer of
3 MicroTCA hardware and software platforms," and that its work environment "promotes
4 excellence, learning, collaboration, and development."

5 12. Plaintiff was an exceptional employee that was devoted and committed to
6 her work with Defendant. Plaintiff's work responsibilities included, but are not limited to,
7 generating sales quotations and sales acknowledgments, maintaining customer profiles
8 and a central customer database, assisting sales managers with proposals, coordinating
9 sales meetings and conference calls, training, writing and updating procedures, and
10 booking corporate travel.

12 13. Plaintiff was initially paid an approximate annual salary of \$50,000.00. Over
13 time, she received various raises. See attached correspondence hereto as EXHIBIT II.

14 14. On or about January 18, 2013, Plaintiff's rate of pay increased to
15 approximately \$55,000.00 annually.

16 15. Plaintiff routinely did work in excess of forty hours per week, but was not
17 lawfully compensated for this extra work by Defendant.

18 16. In or around September of 2013, Plaintiff was no longer paid salary as
19 Defendant elected to pay Plaintiff on an hourly basis.

20 17. After Defendant elected to pay Plaintiff as an hourly employee, Defendant
21 limited the number of hours Plaintiff worked in order to limit the amount of overtime that
22 Plaintiff worked.

23 18. According to Plaintiff's paycheck dated 12/06/2013, Plaintiff was paid at a
24 rate of \$27.40 for each hour worked and such paycheck showed she worked around 40
25 hours per week. See a true and correct copy of Plaintiff's paycheck attached hereto as
26
27
28

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Exhibit III.

19. Generally, Defendant's employees often experienced technical difficulties with the electronic time clock intended to track the hours that employees worked.

20. Plaintiff informed her supervisor when she experienced technical difficulties with the electronic time clock intended to track her hours worked.

21. Plaintiff informed Defendant's human resources department as well as her immediate supervisor of harassment she experienced at work.

22. After Plaintiff opposed harassment and unlawful work practices, Plaintiff's supervisor began to allege that Plaintiff clocked in for hours not worked.

23. On or about June 17, 2014, Defendant terminated Plaintiff for the proffered reason of "time card fraud."

24. Plaintiff opposed in writing her supervisor's accusations of alleged "time card fraud" and requested an investigation of such accusations.

25. At all times relevant, Defendant did not engage in good faith in an investigation regarding Plaintiff's alleged "time card fraud."

26. At all relevant times, Defendant did not engage in progressive discipline or disciplinary action against Plaintiff.

COUNT I

Violation of the Fair Labor Standards Act- Wages **29 U.S.C. §201 et seq. (FLSA)**

27. Plaintiff hereby realleges and incorporates paragraphs 1 through 26 of this Complaint as though fully set forth herein.

28. This count arises from Defendants' violation of the FLSA, 29 U.S.C. §201, et seq., for its failure to pay lawful wages to Plaintiff including but not limited to paying Plaintiff for all time worked in excess of forty (40) hours in individual work weeks.

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1 29. At all material times hereto, Plaintiff was employed by Defendants as an
2 "employee" within the meaning of §3(e)(1) of the FLSA, 29 U.S.C. §203(e)(1). Plaintiff
3 performed a variety of job duties and responsibilities for Defendants within this judicial
4 district and Plaintiff was employed in an inside sales support position.

5 30. At all material times hereto, Defendant was Plaintiff's "employer" per the
6 FLSA, 29 U.S.C. §203(d).

7 31. At all relevant times and during the course of her employment for
8 Defendant, Plaintiff was employed by Defendant and was not exempt from the overtime
9 wages provisions of FLSA 29 U.S.C. §207.
10

11 32. Plaintiff was directed by Defendant to work, and/or Defendant suffered
12 Plaintiff to work, and Plaintiff did such work, in excess of forty (40) hours per week.

13 33. Pursuant to 29 U.S.C. §207, Plaintiff was entitled to be compensated at a
14 rate of one and one-half times her regularly hourly rate of pay for all time worked in
15 excess of forty (40) hours in individual workweeks.

16 34. Defendant did not compensate Plaintiff at a rate of one and one-half times
17 her regular hourly rate of pay for all time worked in excess of forty (40) hours in individual
18 workweeks. Instead, Defendant paid Plaintiff at her regular rate of pay for all hours
19 worked, including hours worked in excess of forty (40) in individual work weeks. For
20 example, Plaintiff worked in excess of 40 (forty) hours per week but was paid only for a
21 forty hour week with no overtime on a set salary basis. In violation of the law, Plaintiff
22 worked in excess of 40 hours a week but was only paid for 40 hours a week.
23

24 35. As a result of Defendant's failure and refusal to pay lawful wages, including
25 overtime wages, to Plaintiff for all time worked in excess of forty(40) hours per week
26 Defendant violated FLSA 29 U.S.C. §207.
27

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36. Defendants willfully violated the FLSA by refusing to pay Plaintiff lawful wages, including overtime wages, for all time worked in excess of forty (40) hours per week. All of the alleged various violations of the law herein were committed intentionally and/or willfully by the Defendants herein.

37. Per the FLSA, Plaintiff seeks all available damages including but not limited to attorneys' fees, liquidated damages, and all lawful wages.

38. As a direct and proximate result of Defendant's conduct described hereinabove, Plaintiff has sustained damages in excess of Ten Thousand Dollars (\$10,000.00).

39. As a result of Defendant's conduct, as set forth herein, Plaintiff has been required to retain the services of an attorney, and, as a direct, natural, and foreseeable consequence thereof, has been damaged thereby, and is entitled to reasonable attorneys' fees and costs.

40. Defendant has acted willfully and maliciously, and with oppression, fraud, or malice, and as a result of Defendant's wrongful conduct, Plaintiff is entitled to an award of exemplary or punitive damages.

COUNT II
Violation of Nevada Revised Statute 608.005 et. seq-Wages

41. Plaintiff hereby realleges and incorporates paragraphs 1 through 40 of this Complaint as though fully set forth herein.

42. NRS 608.005, *et. seq.* which applies to Defendant's business, states that an employee must be paid overtime, equal to 1.5 times the employee's regular rate of pay, for all hours worked in excess of forty (40) hours per week or eight (8) hours per day. Defendants failed to pay Plaintiff her lawful wages in accordance with NRS 608.005, *et.*

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1 seq. by compensating Plaintiff on a set basis of forty hours per week, although Plaintiff
2 worked over forty hours a week.

3 43. Further, upon information and belief, Defendant failed to provide Plaintiff
4 and maintain all records in accordance with NRS 608.15 and has been damaged thereto.

5 44. Pursuant to NRS 608.005, *et. seq.* Plaintiff seeks all available damages
6 for such unlawful payment practices and improper records of wages.

7 45. As a direct and proximate result of Defendant's conduct described
8 hereinabove, Plaintiff has sustained damages in excess of Ten Thousand Dollars
9 (\$10,000.00).

10 46. As a result of Defendant's conduct, as set forth herein, Plaintiff has been
11 required to retain the services of an attorney, and, as a direct, natural, and foreseeable
12 consequence thereof, has been damaged thereby, and is entitled to reasonable attorneys'
13 fees and costs.

14 47. Defendant has acted willfully and maliciously, and with oppression, fraud,
15 or malice, and as a result of Defendant's wrongful conduct, Plaintiff is entitled to an
16 award of exemplary or punitive damages.

17 WHEREFORE, Plaintiff prays for a judgment against Defendant as follows:
18

- 19
- 20 A. A judgment in the amount of one and one-half times Plaintiff's hourly wage
 - 21 rate for all time which Plaintiff worked in excess of forty (40) hours per week;
 - 22 B. Liquidated damages in an amount equal to the amount of unpaid overtime
 - 23 compensation found due;
 - 24 C. All damages and penalties allowed under NRS 608.005 *et. seq.*;
 - 25 D. Reasonable attorneys' fees and costs incurred in filing this action;
 - 26 E. Compensatory Damages in excess of \$10,000.00;
 - 27
- 28

1 F. Special Damages in excess of \$10,000.00;

2 G. Prejudgment and Post-Judgment Interest;

3 H. Such other and further relief as this Court deems appropriate and just.

4 Dated this 28 day of October 2014.

5
6 Respectfully submitted,

7 GABROY LAW OFFICES

8 By _____

9 CHRISTIAN GABROY

10 The District at Green Valley Ranch

11 170 South Green Valley Parkway, Suite
280

12 Henderson, Nevada 89012

13 Tel (702) 259-7777

14 Fax (702) 259-7704

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GABROY LAW OFFICES
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Henderson, Nevada 89012
(702) 259-7777 FAX: (702) 259-7704

EXHIBIT I

I hereby consent to join this matter as a Plaintiff.

Angela Martínez
Name



Signature

EXHIBIT II



June 24, 2011

Angela Martinez
3407 S. Meadow Breeze Way
West Valley City, UT 84128

Dear Angela:

We are pleased to advise that upon careful consideration, VadaTech Incorporated has chosen to extend an offer of employment to you for the position of Inside Sales Support, commencing no later than July 18, 2011. This is a full time salaried position, which requires your attendance at the Henderson, NV office during normal office hours.

Your biweekly salary will be \$1,923.08 (\$50,000 annually), less applicable withholdings. In keeping with our standard hiring practices, you will be placed on probation for a period of 90 days. Paid time off will start to accrue after 6 months of employment at a biweekly rate of 4.615 hours per pay period (15 days per year). Your health benefits will start first of the month after your probationary period ends.

In addition to your wages, you will be entitled to the following:

1. Bonuses payable at the discretion of the employer.
2. Stock options given at the discretion of the employer.
3. Benefits provided in accordance with the employer's benefit plan.

In your work for VadaTech, you will be expected not to use or disclose any confidential information, including trade secrets of any former employer or other person to whom you have an obligation of confidentiality. You agree that you will not bring onto VadaTech premises any unpublished documents or property belonging to any former employer or other person to whom you have an obligation of confidentiality. The expectation is that you will use only that information which is generally known and used by persons with training and experience comparable to your own, which is common knowledge in the industry or otherwise legally in the public domain, or which is otherwise provided or developed by VadaTech.

To ensure a high level of integrity is maintained, as a precondition to employment, we would request that you provide the following:

1. A signed and dated copy of the following employment documents:
 - a. Employment agreement (this letter)
 - b. Confidentiality and Non-Disclosure agreement
 - c. VadaTech Employment Application
2. Proof of your work eligibility in the United States.

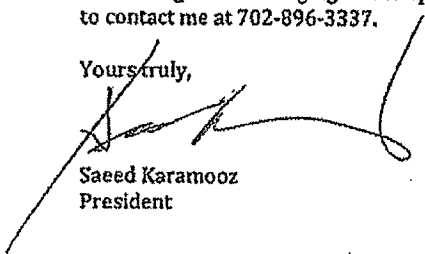
VadaTech Incorporated
11540 South Eastern Avenue, Henderson, NV 89052
Tel: (702) 896-3337 Fax: (702) 896-0332
www.vadatech.com

RKIRIK Dryland com
RKIRIK Dryland

Employment with VadaTech is at-will. Should you decide to accept our offer, you will be an at-will employee within the company. This means the employment relationship can be terminated by either one of us at any time for any reason, with or without cause. The at-will nature of employment with VadaTech constitutes the entire agreement between you and VadaTech. Any changes to these terms must be in writing and signed by you and the company President.

If you are agreeable to these terms, please sign and return this letter to Rosamari McNulty via email or fax (702-566-3094) no later than July 1, 2011. We are confident that VadaTech will provide you with an interesting and challenging career opportunity. If you have any questions or concerns, please do not hesitate to contact me at 702-896-3337.

Yours truly,



Saeed Karamooz
President

I have read this offer letter in its entirety and agree to the terms and conditions of employment. I understand and agree that my employment with VadaTech is at will.



Angela Martinez

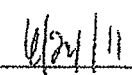

Date

EXHIBIT III

VADATECH INC.
198 N GIBSON ROAD
HENDERSON NV 89014

1502-8621
2 Corporate & Engine
EE ID: 27

06/06/2014

5984

DATE

CHECK NO.

PAY TO THE
ORDER OF

ANGELA MARTINEZ
3669 VIA VICCHIO
HENDERSON NV 89052

Total Net Direct Deposit(s)
** \$1699.21 **

AMOUNT

VOID THIS IS NOT A CHECK DOLLARS

****NON-NEGOTIABLE****

AUTHORIZED SIGNATURE(S)

TO VERIFY AUTHENTICITY OF THIS DOCUMENT THE BACK CONTAINS HEAT SENSITIVE INK THAT CHANGES FROM BLUE TO CLEAR AND ALSO CONTAINS AN ARTIFICIAL WATERMARK WHICH CAN BE VIEWED WHEN HELD AT AN ANGLE.

FOLD AND REMOVE

FOLD AND REMOVE

PERSONAL AND CHECK INFORMATION

Angela Martinez
3669 Via Vicchio
Henderson, NV 89052

Soc Sec #: xxx-xx-xxxx Employee ID: 27
Home Department: 2 Corporate & Engineering

Pay Period: 05/19/14 to 05/31/14
Check Date: 06/06/14 Check #: 5984

NET PAY ALLOCATIONS

DESCRIPTION	THIS PERIOD (\$)	YTD (\$)
Amount	0.00	0.00
Clmg 0194	1699.21	19542.79
NET PAY	1699.21	19542.79

TIME OFF (Based on Policy Year)

DESCRIPTION	AMT TAKEN	AVAIL BAL
PTO	80.00 hrs	23.34 hrs

EARNINGS	DESCRIPTION	HRS/UNITS	RATE	THIS PERIOD (\$)	YTD HOURS	YTD (\$)
	Hourly	71.77	27.4000	1966.50	834.45	22638.97
	Overtime				28.41	1187.64
	Holiday	10.50	27.4000	287.70	42.50	1149.14
	PTO				80.00	2160.96
	EARNINGS	82.27		2254.20	985.36	27324.71
WITHHOLDINGS	DESCRIPTION	FILING STATUS		THIS PERIOD (\$)		YTD (\$)
	Social Security			139.76		1689.25
	Medicare			32.69		395.07
	Fed Income Tax	S 0		382.54		4521.36
	TOTAL			554.99		6605.68
DEDUCTIONS	DESCRIPTION			THIS PERIOD (\$)		YTD (\$)
	SUPP Post Tax					625.40
	TO-PIA MED PRE					78.80
	TO-PXEXP EEPR					472.04
	TOTAL					1176.24

NET PAY

THIS PERIOD (\$)
1699.21

YTD (\$)
19542.79

Payrolls by Paychex, Inc.

1 IAFD

2 GABROY LAW OFFICES

3 Christian Gabroy, Esq. (#8805)

4 The District at Green Valley Ranch

5 170 South Green Valley Parkway, Suite 280

6 Henderson, Nevada 89012

Tel (702) 259-7777

Fax (702) 259-7704

Attorneys for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

ANGELA MARTINEZ, an Individual,

Plaintiff,

vs.

VADATECH, INC.;

EMPLOYEE(S)/AGENT(S) DOES 1-10;

and ROE CORPORATIONS 11-20,

inclusive,

Defendants.

Case No. A-14-707948-C

Dept.: XXIII

Initial Appearance Fee Disclosure

Pursuant to NRS Chapter 19, filing fees are submitted for parties appearing in the above-captioned action as indicated below:

Angela Martinez, Plaintiff

\$270.00

TOTAL REMITTED

\$270.00

Dated this 1st day of October 2013.

GABROY LAW OFFICES

By:

Christian Gabroy (#8805)

170 South Green Valley Parkway,
Suite 280

Henderson, Nevada 89012

Tel (702) 259-7777

Fax (702) 259-7704

SUMM

District Court
CLARK COUNTY, NEVADA

ANGELA MARTINEZ, an Individual,

Plaintiff,

vs.

VADATECH, INC.; EMPLOYEE(S)/AGENT(S)
DOES 1-10; and ROE CORPORATIONS 11-20,
inclusive,

Defendants.

Case No. A-14-707948-C

Dept. No. XXIII

SUMMONS

NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.

TO THE DEFENDANT: A Civil Complaint has been filed by the plaintiff against you for the relief set forth in the Complaint.

VADATECH, INC. c/o SAEED KARAMOOZ

1. If you intend to defend this lawsuit, within 20 days after this Summons is served on you exclusive of the day of service, you must do the following:

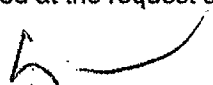
a. File with the Clerk of this Court, whose address is shown below, a formal written response to the Complaint in accordance with the rules of the Court.

b. Serve a copy of your response upon the attorney whose name and address is shown below.

2. Unless you respond, your default will be entered upon application of the plaintiff and this Court may enter a judgment against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint.

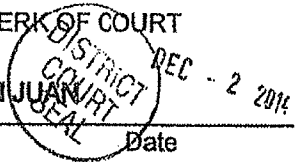
3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

Issued at the request of:


Christian Gabroy
Nevada Bar No. 8805
170 S. Green Valley Parkway, Suite 280
Henderson, Nevada 89012
Attorney for Plaintiff

STEVEN D. GRIERSON, CLERK OF COURT

By: JOSEFINA SANJUAN
Deputy Clerk
County Courthouse
200 South Third Street
Las Vegas, Nevada 89101



*NOTE: When service is by publication, add a brief statement of the object of the action.
See Rules of Civil Procedure, Rule 4(b).

DISTRICT COURT CIVIL COVER SHEET

Clark County, Nevada

Case No. A-14-707948-C Dept XXIII

(Assigned by Clerk's Office)

I. Party Information (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone):

ANGELA MARTINEZ

Defendant(s) (name/address/phone):

VADATECH, INC.; EMPLOYEE(S)/AGENT(S) DOES 1-10;
and ROE CORPORATIONS 11-20, inclusive;

Attorney (name/address/phone):

Gabroy Law Offices

170 S Green Valley Parkway, Suite 280

Henderson, NV 89012

(702) 259-7777

Attorney (name/address/phone):

II. Nature of Controversy (please select the one most applicable filing type below)**Civil Case Filing Types**

Real Property Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant Title to Property <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property Other Real Property <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property		Negligence <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence Malpractice <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	Torts Other Torts <input type="checkbox"/> Product Liability <input type="checkbox"/> Intentional Misconduct <input checked="" type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
Probate Probate (select case type and estate value) <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate Estate Value <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	Construction Defect & Contract Construction Defect <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect Contract Case <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract		Judicial Review/Appeal Judicial Review <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency Nevada State Agency Appeal <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency Appeal Other <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
Civil Writ Civil Writ <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ		Other Civil Filing Other Civil Filing <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Other Civil Matters	

Business Court filings should be filed using the Business Court civil coversheet.

10/1/14

Date

Signature of initiating party or representative

See other side for family-related case filings.